

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
: :
AMTROL HOLDINGS, INC., et al., : Case No. 06-11446 (KG)
: :
: (Jointly Administered)
Debtors. :
: Re: Docket No. 131
: :
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**DESIGNATION OF ITEMS TO BE INCLUDED IN THE
RECORD AND STATEMENT OF ISSUES ON APPEAL**

Pursuant to Federal Bankruptcy Rule 8006, New England Gas Company and Narragansett Electric Company, both d/b/a National Grid (collectively, the "Appellants"), by counsel, hereby (i) designate the items for inclusion in the record and (ii) state the issues, in connection with this appeal, as follows:

DESIGNATION OF RECORD

1. Transcript of the January 11, 2007, hearing.
2. The Debtors' Motion For a Bridge Order and a Final Order (I) Prohibiting Utility Companies From Discontinuing, Altering or Refusing Service, (II) Establishing Procedures For Providing Deposits To Requesting Utilities, (III) Deeming

Utility Companies To Have Adequate Assurance of Payment, and

(IV) Establishing Procedures For Resolving Requests For

Additional Assurance Pursuant To 11 U.S.C. §§ 105(a) & 366 (Docket No. 23) (the "Utility Motion").

3. *Exhibit C to the Utility Motion (Docket No. 29).*

4. *Affidavit of Service dated December 19, 2006*

(Docket No. 31).

5. *Bridge Order (I) Prohibiting Utility Companies From*

Discontinuing, Altering or Refusing Service, (II)

Establishing Procedures For Providing Deposits To Requesting

Utilities, (III) Deeming Utility Companies To Have Adequate

Assurance of Payment, and (IV) Establishing Procedures For

Resolving Requests For Additional Assurance Pursuant To 11

U.S.C. §§ 105(a) & 366 (Docket No. 51) (the "Bridge Order").

6. *Objection of New England Gas Company And*

Narragansett Electric Company, Both d/b/a National Grid To

the Utility Motion (Docket No. 94) (the "Objection").

7. *Final Order (I) Prohibiting Utility Companies From*

Discontinuing, Altering or Refusing Service, (II)

Establishing Procedures For Providing Deposits To Requesting

Utilities, (III) Deeming Utility Companies To Have Adequate

Assurance of Payment, and (IV) Establishing Procedures For

Resolving Requests For Additional Assurance Pursuant To 11 U.S.C. §§ 105(a) & 366 that was entered on January 11, 2007

(Docket No: 120). (the "Final Order").

8. *Notice of Appeal* dated January 19, 2007 (Docket No. 131).

STATEMENT OF ISSUES

1. Did the Bankruptcy Court err in entering the Bridge Order on an *ex parte* basis, which required the Appellants to retain counsel and file an objection to retain its rights under 11 U.S.C. §366?

2. Did the adequate assurance of payment procedures approved by the Bankruptcy Court in the third Ordered paragraph of the Final Order violate the provisions of 11 U.S.C. §366?

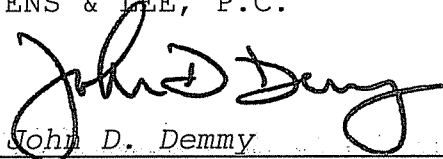
3. Did the Bankruptcy Court err in holding that the Debtors' Utility Motion was a pleading filed pursuant to 11 U.S.C. §366(c)(3)(A) that was ripe for an evidentiary hearing and adjudication at the January 11, 2007 hearing?

4. Did the Bankruptcy Court err in holding an evidentiary hearing at the January 11, 2007 hearing on the Utility Motion and the Objection to the Utility Motion filed by Appellants?

5. Did the Bankruptcy Court err in holding that Appellant's adequate assurance of payment request of a two-month deposit should be modified to the payment of a two-week deposit pursuant to the Final Order?

Dated: January 26, 2007

STEVENS & LEE, P.C.



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